

1.0 Objective

This procedure has been developed to detail the requirements for management, prevention and/or reduction of fugitive emission producing activities at CELSA Manufacturing (UK).

2.0 Scope

This procedure refers to all direct and ancillary activities associated with continuous operation from the CELSA Melt Shop and Mineral Site which may give rise to fugitive emissions. This procedure also refers to the road dampening at the Melt Shop, Sections Mill and Rod & Bar Mill.

3.0 Responsibilities

3.1 The implementation of this procedure is the responsibility of the Operations Manager and Environmental Manager or a nominated representative(s).

3.2 The Operations Manager will nominate responsible persons to meet the requirements in Section 4.0.

4.0 Procedure

4.1 General

Nominated personnel will carry out the requirements relating to fugitive emissions management as prescribed below.

4.2 Melt Shop Furnace Charging

When charging the furnace, the roof must be off for the minimum amount of time.

Extraction must be activated with a minimum amount of delay.

4.3 Site Dust Suppression

A bowser will be used to wet the site to minimise dust emissions at the Mineral Site and the side roads at the Tremorfa and Castle Works sites.

In addition at the Mineral Site, a second bowser will be used to wet the stock piles of slag to minimise any dust emissions that may occur.

During dry and windy weather conditions, the frequency of dust suppression is increased as deemed appropriate by the Operational Manager.

A road sweeper will also be used to remove residual dust from the site roadways at the Mineral Site and the side roads at the Tremorfa and Castle Works sites.

4.4 Slag Handling Activities

4.4.1 Melt Shop

Slag handling at the Melt Shop is limited to the slag handling area.

Slag will be removed from under the furnace and tundish area and transferred to the 'Cow Shed' where wetting is applied to cool the slag and minimise dust lift-off.

Water spraying is used to cool the ladle slag and minimise dust lift-off in the ladle slag area before transfer to the 'Cow Shed'. Additional water spraying in the 'Cow Shed' is also in operation to cool the slag and minimise dust lift off. Water spraying is used during loading of slag from the 'Cow Shed' into lorries. The slag is then transported for further cooling at the Mineral Site.

All residual dust inside the Melt Shop must be cleaned using a vacuum tanker. Dust collected by the vacuum tanker must be bagged directly using a mobile hopper. No dust from cleaning activities is to be deposited in the 'Cow Shed'.

4.4.2 Mineral Site

A contractor will be appointed to manage the slag lagoon tipping and cooling operations at the Mineral Site. The appointed contractor will be responsible for the following:

- The use of the slag lagoon water spray system to cool the slag and minimise dust lift-off.
- Ensuring that the water tanks are sufficiently filled and appropriate spray banks are running to allow optimum dust suppression. Any faults to the water spray system must be reported to CELSA appointed contact.
- Attend slag dumper tips at the cooling lagoons and provide additional dust suppression via the bowser water cannon.
- Dust suppression will be used on the Extech screening machine to minimise dust lift-off.

Further (specific) details of the appointed contractor's duties, in relation to dust suppression activities at the Mineral Site, will be documented in a formal supplier contract between CELSA and the appointed contractor.

A windsock will be used to monitor the prevailing wind direction and speed so that site activities can be managed accordingly to minimise dust lift-off and carry-over from site.

If there are high easterly winds blowing the screen ***must only be loaded with unprocessed furnace slag*** and every effort must be made to reduce the dust lift off from the screening operation.

Prepared by: **Environmental Advisor** Approved by: **Environmental Manager**

4.5 External Doors

All Melt Shop external doors (high and low level) ***must remain closed.***

All Melt Shop external doors ***must be checked by the shift manager*** at the beginning of the shift. These checks will be recorded in the shift log.

4.6 Site Vehicles

All site vehicles must adhere to the site speed limits of 10 mile/hour on the Mineral Site and the side roads at the Tremorfa and Castle Works sites.

4.7 Dust Complaints

During normal operating hours, the Environmental Department should be informed of the complaint and the Environmental Manager or delegate will record the complaint as an Environmental Incident on Prosafety and raise any appropriate actions.

Out of normal operational hours, the complaints will be forwarded to the Shift Manager. The Shift Manager should record the complaint on Prosafety and raise any appropriate actions. The Environmental department should also be informed. This is in accordance with CP/B033 EHS Communications Procedure.

5.0 Records

5.1 Melt Shop Shift Managers Log

The external door checks will be recorded in the Shift Manager's log sheet.

5.3 Harsco Melt Shop Shift Report

Harsco will maintain slag movement data.

5.4 Prosafety

The complaint report will be uploaded to Prosafety within the 'Accidents and Incidents' module. This will be undertaken by the Environmental Department during receipt of a complaint during normal operating hours. Out of normal operating hours, the Shift Manager has the responsibility to upload the report onto Prosafety.

5.5 Environmental Scorecard

Complaints will be recorded in the Environmental Scorecard and maintained by the Environmental Advisor. This Scorecard is discussed in the monthly environmental meetings at each business unit.

6.0 Documentation

6.1 Shift Manager's Log.

6.2 Harsco Melt Shop Shift Report.



Fugitive Emissions Management Procedure

ECP 12

Page 4 of 4

Rev 3

Prepared by: Environmental Advisor Approved by: Environmental Manager

Date Dec 16

- 6.3 Contractor Mineral Site Log.
- 6.4 Prosafety 'Environmental Incidents' module
- 6.5 Environmental Scorecard